

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IKE ANAELE

a/k/a Issaac W. Anaele,

Defendant.

: Hon. Joseph A. Dickson

: Mag. No. 13-6595

: **NOTICE OF MOTION TO WITHDRAW
AS COUNSEL OF RECORD**

TO:

Andrew J. Bruck, AUSA
United States Attorney's Office
970 Broad Street, Room 700
Newark, NJ 07102

Robert Frazer, AUSA
United States Attorney's Office
970 Broad Street, Room 700
Newark, NJ 07102

SIRS:

PLEASE TAKE NOTICE that Arleo, Donohue & Biancamano, LLC, through Stacy A. Biancamano, Esq., appointed counsel for defendant Ike Anaele, will move on short notice before the Honorable Joseph A. Dickson, United States District Judge, on a date and time to be set by the Court

- (1) For an Order relieving Stacy A. Biancamano as counsel for Mr. Anaele and appointing substitute counsel.

PLEASE TAKE FURTHER NOTICE that in support of this firm will rely upon the Certification of Stacy A. Biancamano included herewith;

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

ORAL ARGUMENT IS WAIVED UNLESS OPPOSITION IS FILED.

ARLEO, DONOHUE & BIANCAMANO, LLC
Attorneys for Defendant, Ike Anaele

By: Stacy Biancamano
Stacy A. Biancamano

Dated: November 22, 2013

CERTIFICATION OF SERVICE


STACY A. BIANCAMANO, certifies as follows:

1. On the date below, the original and one copy of the following documents were filed with the United States District Court via electronic mail and a copy served upon Andrew J. Bruck, AUSA and Robert Frazer, AUSA, United States Attorney's Office, 970 Broad Street, Newark, New Jersey, via email.

- (a) Notice of Motion To Be Relieved as Counsel;
- (b) Certification of Stacy A. Biancamano;
- (c) Proposed form of Order.

2. On the date below, a copy of the above documents were served upon defendant Ike Anaele, Inmate No.: 07457496, Essex County Department of Corrections, 354 Doremus Avenue, Newark, New Jersey 07105 via certified mail, return receipt requested.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Stacy A. Biancamano

Dated: November 22, 2013